

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED  
COMMUNICATIONS & TECHNOLOGIES,  
INC., JADE CHENG, JASON YUYI,  
CATHY YU, CAROLINE MARAFAO  
CHENG, PUSHUN CHENG, CHANGZHEN  
NI, JUNFANG YU, MEIXIANG CHENG,  
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL  
SERVICES COMPANY, HEWLETT-  
PACKARD FINANCIAL SERVICES  
(INDIA) PRIVATE LIMITED, HP INC.,  
HEWLETT PACKARD ENTERPRISE  
COMPANY, and DAVID GILL

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

**DEFENDANTS' MOTION TO STRIKE AND PRECLUDE PLAINTIFFS' UNTIMELY  
DOCUMENT PRODUCTIONS**

Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company and David Gill ("Defendants"), by and through their undersigned counsel and for the reasons set forth in Defendants' accompanying Memorandum, respectfully request that the Court grant Defendants' Motion to Strike and Preclude Plaintiffs' Untimely Document Productions.

Specifically, Defendants request that the Court strike Plaintiffs' late productions and preclude Plaintiffs' Exhibits 39, 46, 48 and 98 [ECF 520-42, ECF 520-49, ECF 520-51 and ECF 520-101], which Plaintiffs relied upon in their Opposition and Sur-Reply to Defendants' Motion for Summary Judgment.

Dated: September 14, 2021

/s/ Paul A. Saso

Michael H. Bunis (BBO No. 566839)

G. Mark Edgerton (BBO No. 657593)

Kevin C. Quigley (BBO No. 685015)

**CHOATE HALL & STEWART LLP**

Two International Place

Boston, Massachusetts 02110

(617) 248-5000

mbunis@choate.com

medgerton@choate.com

kquigley@choate.com

Anthony P. Callaghan

Paul A. Saso

**GIBBONS P.C.**

One Pennsylvania Plaza, 37th Floor

New York, New York, 10119

(212) 613-2000

*Counsel for Defendants*